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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Hazardous Sites
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Date: October 14, 1999

Mr. Robert Schirmer, PE
Atlantic Division, Naval Facilities Engineering Command
Environmental Quality Division
Code: 1822
Building N 26, Room 54
1510 Gilbert Street
Norfolk, Va 23511-2699

Re: Cheatham Annex Site - Naval Weapons Station Yorktown, Va.
Review of the Navy's Draft *Fiscal Year 2000 Site Management Plan*

Dear Mr. Schirmer:

The U.S. Environmental Protection Agency (EPA) has preliminarily reviewed the Navy's draft *Fiscal Year 2000 Site Management Plan* for performance of response actions at the Cheatham Annex Site-Naval Weapons Station Yorktown (Cheatham Annex) facility, and we offer the following comments:

1. Site 1

As EPA understands, the Navy is intending to perform a Time Critical Removal Action (TCRA) at Site 1 to stabilize the landfill. The TCRA is scheduled to be accomplished in December, 1999. The draft SMP then mentions the development of an EE/CA at Site 1, beginning in January, 2000. The term EE/CA is defined in the NCP and involves the performance of a non-time critical removal action. The Region is wondering if the Navy is truly intending on performing a non-time critical removal action at Site 1 in the year 2000 just after completing a time-critical removal action? If so, usually an Action Memorandum, or similar, would be needed to select the removal action. A public comment period is also usually announced.

EPA typically views response actions at landfills, especially final actions, to be remedial investigations, not removals. The Region was also wondering if the term focused feasibility study wasn't a more appropriate term for the study at Site 1? Is the response action at Site 1 envisioned as a final action to include capping, long-term monitoring, or operation and maintenance requirements?

2. Site 8

Can the Navy confirm the "inert" nature of the materials disposed of at Site 8? Is there sampling data that can be "screened"?

3. Site 10

The groundwater at Site 10 needs to be further investigated. The source of the dichloropropane and dissolved mercury in the groundwater needs to be ascertained. What are the breakdown products of DS-2?

More importantly, the Region noted that the site description of Site 10 included mention of finding small bottles on-site, approximately 3 inches in height, containing a dry-yellow material. Given that the site was used to bury DS-2, a chemical warfare decontamination agent, could it be possible the site was also used as an area to decontaminate chemical warfare materials? The small bottles described in the text of the SMP could be part of a Navy M1 gas identification kit, or M72 chemical agent identification kit. Are these bottles still in the woods? If so, is there any discernable etching or labeling on these bottles?

It is also interesting to note that the Navy M1 and M72 gas identification kits were stored in non-metallic containers, usually wooden or plastic boxes. Therefore, the performance of EM may or may not have detected the presence of such buried kits. Is there any TIC data available for this site?

3. Former Penniman Ordnance Plant areas

The Navy should probably consider adding at least one or two Operable Units to the Fiscal Year 2000 SMP related to the investigation of the former Penniman Ordnance Plant structures located on Navy property. The Region recommends considering the following locations:

- former TNT graining house sump
- former TNT catch box ruins
- underground mixing tanks and associated piping system
- metallic slag located at the south/southeastern part of Cheatham Annex

This concludes EPA's preliminary review of the Navy's draft *Fiscal Year 2000 Site Management Plan* for Cheatham Annex. If you have any questions regarding the above, please feel free to call me at (215) 814-3357,

Sincerely,



Robert Thomson, P.E., AEP
Hazardous Sites